

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 9:23-CV-80644-RLR

FREDERICK H. MILLER,

Plaintiff,

v.

NAVY FEDERAL CREDIT UNION and  
EXPERIAN INFORMATION SOLUTIONS,  
INC.,

Defendant.

/

**DECLARATION OF LISA PAULSON**

Pursuant to 28 U.S.C. § 1746, I, Lisa Paulson, hereby attest and affirm as follows:

1. I am an adult competent to testify to the matters set forth herein.
2. I am the Assistant Vice President of Credit Bureau Furnishing and Disputes at defendant Navy Federal Credit Union (“Navy Federal”) and am authorized to make this Declaration on behalf of Navy Federal.
3. I make this Declaration in support of the Motion for Summary Judgment filed by Navy Federal in the above-captioned action.
4. I am familiar with and have access to business records maintained by Navy Federal, as well as its established procedure for making and maintaining such records.
5. The information described in this Declaration and referenced below is taken from my personal knowledge and/or business records maintained by Navy Federal.
6. I have personal knowledge of Navy Federal’s routine practices and procedures for making and maintaining the records about which I am testifying. Such records are made at or near

the time of the occurrence of the recorded matter(s); made by, or from information transmitted by, persons with personal knowledge of the recorded matter(s); and kept in the course of the respective and regularly-conducted business activities of Navy Federal. It is the regular practice of Navy Federal to make such records. Based upon records maintained by Navy Federal, I have gained knowledge of facts set forth in this Declaration and, if called upon as a witness to testify, could and would competently testify as to those facts, under penalties of perjury.

7. Navy Federal is a national credit union and is a furnisher of information subject to the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et. seq.*

8. In July 2022, a Navy Federal credit card account (the “Account”) was opened in the name of plaintiff Frederick H. Miller (“Plaintiff”) as a result of identity theft.

9. Plaintiff disputed the Account with Experian Information Solutions (“Experian”) and TransUnion LLC (“TransUnion”), which are two of the three major credit reporting agencies (each a “CRA”).

10. When a consumer initiates a dispute with a CRA regarding an account, the CRA submits the information provided by the consumer to the furnisher who provided any item of information in dispute via an Automated Credit Dispute Verification form (an “ACDV”).

11. In each ACDV, the CRA inputs a Dispute Code regarding the nature of the dispute and also adds a Control Number to identify the dispute.

12. Navy Federal reviews, investigates, and processes each ACDV based upon the Dispute Code listed on the ACDV by the CRA.

13. When Navy Federal sends an ACDV response to a CRA through the e-OSCAR application, e-OSCAR generates a notification to the other CRAs with the response information.

### **The November 19 ACDV**

14. On November 19, 2022, Navy Federal received an ACDV from Experian regarding Plaintiff's Account (the "November 19 ACDV"), in which Experian listed the Dispute Code as "1." A true and correct copy of the November 19 ACDV is attached hereto as Exhibit A. The November 19 ACDV did not have any associated images attached to it. *See* Ex. A.

15. An ACDV Dispute Code of 001 (or 1) means "Not his/hers. Provide or confirm complete ID." An ACDV with a Dispute Code of 001 is not an identity theft claim or a fraud claim, as there are separate Dispute Codes for identity theft (103) and fraud (104).

16. When Navy Federal receives an ACDV with a Dispute Code of 001, Navy Federal conducts an investigation to determine whether the consumer's information provided in the ACDV (*i.e.*, name, Social Security Number, date of birth) is consistent with the information contained in Navy Federal's internal records. If the information is accurate, Navy Federal will respond to the ACDV with a Response Code of "01: Account information accurate as of date reported" or a Response Code of "23: Disputed information is accurate. Updated account information unrelated to the dispute." If the information is not accurate, Navy Federal will respond to the ACDV with a Response Code of "21: Updated disputed account information only." or a Response Code of "22: Updated disputed account information and additional account information was also updated." Navy Federal will include updated consumer information (*i.e.*, name, Social Security Number, date of birth) in the ACDV response.

17. If an ACDV with a Dispute Code of 001 also has images attached to it indicating that the consumer is claiming identity theft/fraud, such as a police report or a Federal Trade Commission Identity Theft Report, Navy Federal treats the ACDV as if it had been submitted with a Dispute Code of "103: Claims true identity fraud/account fraudulently opened."

18. Upon receipt of the November 19 ACDV with a Dispute Code of 001, Navy Federal investigated the dispute by reviewing all of the information provided by Experian in the November 19 ACDV, including the name, address, date of birth, and Social Security Number, and comparing it to the information in Navy Federal's records.

19. Based on Navy Federal's investigation, the name, date of birth, and Social Security Number reflected in the November 19 ACDV were accurate and consistent with Navy Federal's records. The address included in the November 19 ACDV differed from the address in Navy Federal's records, which was reflected in Navy Federal's response to the November 19 ACDV. *See Ex. A hereto.* A difference of address could be due to many reasons, such as a member moving or a different mailing address, and thus Navy Federal will still confirm that account information is accurate if there is a difference of address between an ACDV and Navy Federal's internal records.

20. On December 2, 2022, Navy Federal provided its response to the November 19 ACDV to Experian with a Response Code of "23: Disputed information is accurate. Updated account information unrelated to the dispute." *See Ex. A.* In its response to the November 19 ACDV, Navy Federal updated the compliance condition code (XC: Completed investigation of FCRA dispute – consumer disagrees), the type of account (R: Revolving (open-end account)), and the type of interest (V: variable/adjustable). *Id.*

### **The Identity Theft ACDVs**

21. On December 19, 2022, Navy Federal received a new ACDV from Experian regarding Plaintiff's Account (the "December 19 ACDV"), in which Experian listed the Dispute Code as "103: Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID." A true and correct copy of the December 19 ACDV is attached hereto as Exhibit B. The Control Number for the December 19 ACDV is 2118769848001. *See Ex. B.*

22. An ACDV Dispute Code of 103 means “Claims true identity fraud/account fraudulently opened.” When Navy Federal receives an ACDV with a Dispute Code of 103, the information contained in the ACDV, along with any associated images attached to the ACDV, is transmitted to the identity theft group within the security department of Navy Federal for a detailed and thorough investigation for identity theft/fraud.

23. The December 19 ACDV was the first ACDV received by Navy Federal concerning Plaintiff’s Account that listed the identity theft Dispute Code 103.

24. On December 28, 2022, Navy Federal received another ACDV from Experian (the “December 28 ACDV”) regarding Plaintiff’s Account, which also listed the Dispute Code as “103: Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.” A true and correct copy of the December 28 ACDV is attached hereto as Exhibit C.

25. The FCRA Relevant Information section of the December 28 ACDV stated “Previously Control No. 2118769848,” which is the first 10 digits of the Control Number for the December 19 ACDV and thus indicated that the December 28 ACDV was associated with the dispute evidenced by the December 19 ACDV.

26. The December 28 ACDV included associated images that Plaintiff provided to Experian – namely, a one-page letter from Plaintiff to Experian along with a Federal Trade Commission Identity Theft Report completed and signed by Plaintiff (the “FTC Affidavit”). See Ex. C.

27. Navy Federal reviewed all relevant information provided by Experian in the December 19 ACDV and the December 28 ACDV, including the name, address, date of birth, and Social Security Number, and compared it to the information in Navy Federal’s records. Navy Federal also reviewed the one-page letter from Plaintiff to Experian and the FTC Affidavit that

were attached as Associated Images to the December 28 ACDV. This review is evidenced by the “Yes” in the “Image Accessed Indicators” field on the December 28 ACDV, which field is automatically populated with the word “Yes” once the credit bureau dispute specialist has reviewed the associated images attached to the ACDV. *See Ex. C* hereto. After this initial review in connection with the December 19 ACDV and the December 28 ACDV, Navy Federal responded to Experian with Response Codes of “01: Account information accurate as of date reported” for each ACDV. *See Exs. B and C.*

28. On January 10, 2023, Navy Federal received an ACDV from TransUnion (the “January TransUnion ACDV”) regarding Plaintiff’s Account, which also listed the Dispute Code as “103: Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.” A true and correct copy of the January TransUnion ACDV is attached hereto as Exhibit D.

29. The January TransUnion ACDV was the only ACDV regarding Plaintiff’s Account that Navy Federal received from TransUnion.

30. Navy Federal reviewed all relevant information provided by TransUnion in the January TransUnion ACDV, including the name, address, date of birth, and Social Security Number, and compared it to the information in Navy Federal’s records. After this initial review in connection with the January TransUnion ACDV, Navy Federal responded to TransUnion with a Response Code of “23: Disputed information accurate. Updated account information unrelated to the dispute.” *See Ex. D.* In its response to the January TransUnion ACDV, Navy Federal updated the Account Status to “80: Account 90-119 days past the due date.” *Id.*

31. On or about January 30, 2023, Navy Federal’s identity theft group within the security department honored Plaintiff’s claim of identity theft, and the Account was deleted due to fraud on January 31, 2023. A true and correct copy of Navy Federal’s January 31, 2023 response

to an Equifax ACDV, which contained a Response Code of “7: Delete due to fraud” is attached hereto as Exhibit E. Navy Federal’s January 31, 2023 ACDV response was sent to Equifax through the e-OSCAR application.

32. On February 2, 2023, Navy Federal sent an update to TransUnion instructing it to mask all credit bureau inquiries associated with the Account origination.

I declare under penalties of perjury pursuant to the laws of the United States of America  
that the foregoing is true and correct.

Dated: January 12, 2024

- DocuSigned by:

Lisa Paulson

— 20CB3AC49ED848C..

LISA PAULSON

# **EXHIBIT "A"**

ACDV Response:				3579838675001
Account Number:	REDACTED 7885	SSN:	REDACTED	
Consumer Name:	FREDERICK MILLER	Control Number:	3579838675001	
Date Received:	11/19/2022	Originator:	Experian	
Response Code:	23:Disputed information accurate. Updated account information unrelated to the dispute.	Subscriber Code:	1223555	
Response Date:	12/02/2022	DF Contact Number:		
Response Due Date:	12/12/2022	DF Authorized Name:	Melissa Hartley	
Queue Name:	CreditCards			
Dispute Information:				
Dispute Code 1:	1:			
Dispute Code 2:				
FCRA Relevant Information:	I HAVE NO ACCOUNT WITH NAVY CREDIT UNION. IF ACCOUNT WAS OPEN IN MY NAME IT WAS FRAUD.			
Image Information:				
Associated Images:	No			
Image ID:				
Image Accessed Indicators:				
Consumer Information:				
	Request Data	Response Data	Same / Diff	
Last Name:	MILLER	MILLER	Same	
First Name:	FREDERICK	FREDERICK	Same	
Middle Name:			Unknown	
Generation Code:			Unknown	
Prev. Last Name:			Unknown	
Prev. First Name:			Unknown	
Prev. Middle Name:			Unknown	
Prev.Generation Code:				
SSN:	REDACTED	REDACTED	Same	
Date Of Birth:	REDACTED	REDACTED	Same	
Telephone Number:			Unknown	
ECOA Code:	1:Individual	1:Individual		
Street Address:	22110 TOWN GREEN DR	601 DEER RD	Different	
City:	ELMSFORD	CHERRY HILL		
State:	NY:New York	NJ:New Jersey		
Zip:	10523	80341409		
Prev. Street Address:			Unknown	
Prev. City:				
Prev. State:				
Prev. Zip:				
2nd Prev. Street Address:				
2nd Prev. City:				
2nd Prev. State:				
2nd Prev. Zip:				

3.57984E+12												
Account Information:												
Account Status:	Request Data										Response Data	
Account Status:	71:Account 30-59 days past the due date.											
Payment Rating:												
Cond. / Cum. Status:	OPEN/ DEL 30 DAY											
CII:												
MOP:												
CCC:											XC:Completed investigation of FCRA dispute - consumer disagrees.	
SCC:												
Portfolio Type:											R:Revolving (open-end account)	
Account Type:	18:Credit Card											
Interest Type Indicator:											V:Variable/Adjustable	
Terms Duration:	REV											
Terms Frequency:	M:Monthly											
Date Opened:	07/30/2022											
Date of Account Information:	11/14/2022											
Date of Last Payment:												
Date Closed:												
FCRA DOFD:												
Current Balance:	4485											
Amount Past Due:	88											
High Credit / Original Amt.:	4485											
Credit Limit:	8900											
Original Charge Off Amount:												
Actual Payment:												
Scheduled Monthly Payment:	89											
Original Creditor Name:												
Creditor Classification:												
Agency ID:												
Sec. Mktg. Agency Acct Num:												
Mortgage ID Number (MIN):												
Specialized Payment Ind.:												
Defrd. Payment Start Date:												
Balloon Payment Amt.:												
Balloon Payment Due Date:												
Portfolio Indicator:												
Purchased From / Sold To:												
Narrative / Remarks:												
Account History												
Year	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan
2019	Req.											
	Resp.											
2018	Req.											
	Resp.											
2017	Req.											
	Resp.											
2016	Req.											
	Resp.											
2015	Req.											
	Resp.											
2014	Req.											
	Resp.											
2013	Req.											
	Req.											
2012	Req											
	Res											

Associated Consumer Information		
Last Name:		
First Name:		
Middle Name:		
Generation Code:		
SSN:		
Date Of Birth:		
Telephone Number:		
ECOA Code:		
CII:		
Street Address:		
City:		
State:		
Zip:		
Submitted by:	Melissa Hartley	Date: 12/02/2022
<b>By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.</b>		

# **EXHIBIT "B"**

ACDV Response:				2118769848001
Account Number:	REDACTED 7885	SSN:	REDACTED	
Consumer Name:	FREDERICK MILLER	Control Number:	2118769848001	
Date Received:	12/19/2022	Originator:	Experian	
Response Code:	1:	Subscriber Code:	1223555	
Response Date:	12/30/2022	DF Contact Number:		
Response Due Date:	01/11/2023	DF Authorized Name:	Douglas Gonzalez	
Queue Name:	ID Theft Fraud			
Dispute Information:				
Dispute Code 1:	103:Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.			
Dispute Code 2:				
FCRA Relevant Information:				
Image Information:				
Associated Images:	No			
Image ID:				
Image Accessed Indicators:				
Consumer Information:				
	Request Data	Response Data	Same / Diff	
Last Name:	MILLER	MILLER	Same	
First Name:	FREDERICK	FREDERICK	Same	
Middle Name:			Unknown	
Generation Code:			Unknown	
Prev. Last Name:			Unknown	
Prev. First Name:			Unknown	
Prev. Middle Name:			Unknown	
Prev.Generation Code:				
SSN:	REDACTED	REDACTED	Same	
Date Of Birth:	REDACTED	REDACTED	Same	
Telephone Number:			Unknown	
ECOA Code:	1:Individual	1:Individual		
Street Address:	22110 TOWN GREEN DR	601 DEER RD	Different	
City:	ELMSFORD	CHERRY HILL		
State:	NY:New York	NJ:New Jersey		
Zip:	10523	80341409		
Prev. Street Address:			Unknown	
Prev. City:				
Prev. State:				
Prev. Zip:				
2nd Prev. Street Address:				
2nd Prev. City:				
2nd Prev. State:				
2nd Prev. Zip:				

2.11877E+12																							
Account Information:																							
		Request Data					Response Data																
Account Status:	78:Account 60-89 days past the due date.																						
Payment Rating:																							
Cond. / Cum. Status:	CLOSED/ DEL 60																						
CII:																							
MOP:																							
CCC:	XC:Completed investigation of FCRA dispute - consumer disagrees.																						
SCC:	M:Account closed at credit grantor's request.																						
Portfolio Type:																							
Account Type:	18:Credit Card																						
Interest Type Indicator:																							
Terms Duration:	REV																						
Terms Frequency:	M:Monthly																						
Date Opened:	07/30/2022																						
Date of Account Information:	12/14/2022																						
Date of Last Payment:																							
Date Closed:																							
FCRA DOFD:																							
Current Balance:	4546																						
Amount Past Due:	177																						
High Credit / Original Amt.:	4546																						
Credit Limit:	8900																						
Original Charge Off Amount:																							
Actual Payment:																							
Scheduled Monthly Payment:	90																						
Original Creditor Name:																							
Creditor Classification:																							
Agency ID:																							
Sec. Mktg. Agency Acct Num:																							
Mortgage ID Number (MIN):																							
Specialized Payment Ind.:																							
Defrd. Payment Start Date:																							
Balloon Payment Amt.:																							
Balloon Payment Due Date:																							
Portfolio Indicator:																							
Purchased From / Sold To:																							
Narrative / Remarks:	CALL 8005250689 FOR CONSUMER STATEMENT																						
Account History																							
Year	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan											
2019	Req.																						
	Resp.																						
2018	Req.																						
	Resp.																						
2017	Req.																						
	Resp.																						
2016	Req.																						
	Resp.																						
2015	Req.																						
	Resp.																						
2014	Req.																						
	Resp.																						
2013	Req.																						
	Req.																						
2012	Req																						
	Res																						

Associated Consumer Information		
Last Name:		
First Name:		
Middle Name:		
Generation Code:		
SSN:		
Date Of Birth:		
Telephone Number:		
ECOA Code:		
CII:		
Street Address:		
City:		
State:		
Zip:		
Submitted by:	Douglas Gonzalez	Date: 12/30/2022

By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.

# **EXHIBIT "C"**

ACDV Response:				3328054874008
Account Number:	REDACTED 7885	SSN:	REDACTED	
Consumer Name:	FREDERICK H MILLER	Control Number:	3328054874008	
Date Received:	12/28/2022	Originator:	Experian	
Response Code:	1:	Subscriber Code:	1223555	
Response Date:	12/30/2022	DF Contact Number:		
Response Due Date:	01/20/2023	DF Authorized Name:	Douglas Gonzalez	
Queue Name:	ID Theft Fraud			
Dispute Information:				
Dispute Code 1:	103:Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.			
Dispute Code 2:				
FCRA Relevant Information:	PREVIOUSLY CONTROL NO 2118769848			
Image Information:				
Associated Images:	Yes			
Image ID:	168127996			
Image Accessed Indicators:	Yes			
Consumer Information:				
	Request Data	Response Data	Same / Diff	
Last Name:	MILLER	MILLER	Same	
First Name:	FREDERICK	FREDERICK	Same	
Middle Name:	H		Unknown	
Generation Code:			Unknown	
Prev. Last Name:			Unknown	
Prev. First Name:			Unknown	
Prev. Middle Name:			Unknown	
Prev.Generation Code:				
SSN:	REDACTED	REDACTED	Same	
Date Of Birth:	REDACTED	REDACTED	Same	
Telephone Number:			Unknown	
ECOA Code:	1:Individual	1:Individual		
Street Address:	7120 OKEECHOBEE BLVD APT 5206	601 DEER RD	Different	
City:	WEST PALM BEACH	CHERRY HILL		
State:	FL:Florida	NJ:New Jersey		
Zip:	33411	80341409		
Prev. Street Address:			Unknown	
Prev. City:				
Prev. State:				
Prev. Zip:				
2nd Prev. Street Address:				
2nd Prev. City:				
2nd Prev. State:				
2nd Prev. Zip:				

3.32805E+12																							
Account Information:																							
		Request Data					Response Data																
Account Status:	78:Account 60-89 days past the due date.																						
Payment Rating:																							
Cond. / Cum. Status:	CLOSED/ DEL 60																						
CII:																							
MOP:																							
CCC:	XC:Completed investigation of FCRA dispute - consumer disagrees.																						
SCC:	M:Account closed at credit grantor's request.																						
Portfolio Type:																							
Account Type:	18:Credit Card																						
Interest Type Indicator:																							
Terms Duration:	REV																						
Terms Frequency:	M:Monthly																						
Date Opened:	07/30/2022																						
Date of Account Information:	12/14/2022																						
Date of Last Payment:																							
Date Closed:																							
FCRA DOFD:																							
Current Balance:	4546																						
Amount Past Due:	177																						
High Credit / Original Amt.:	4546																						
Credit Limit:	8900																						
Original Charge Off Amount:																							
Actual Payment:																							
Scheduled Monthly Payment:	90																						
Original Creditor Name:																							
Creditor Classification:																							
Agency ID:																							
Sec. Mktg. Agency Acct Num:																							
Mortgage ID Number (MIN):																							
Specialized Payment Ind.:																							
Defrd. Payment Start Date:																							
Balloon Payment Amt.:																							
Balloon Payment Due Date:																							
Portfolio Indicator:																							
Purchased From / Sold To:																							
Narrative / Remarks:	CALL 8005250689 FOR CONSUMER STATEMENT																						
Account History																							
Year	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan											
2019	Req.																						
	Resp.																						
2018	Req.																						
	Resp.																						
2017	Req.																						
	Resp.																						
2016	Req.																						
	Resp.																						
2015	Req.																						
	Resp.																						
2014	Req.																						
	Resp.																						
2013	Req.																						
	Req.																						
2012	Req																						
	Res																						

Associated Consumer Information		
Last Name:		
First Name:		
Middle Name:		
Generation Code:		
SSN:		
Date Of Birth:		
Telephone Number:		
ECOA Code:		
CII:		
Street Address:		
City:		
State:		
Zip:		
Submitted by:	Douglas Gonzalez	Date: 12/30/2022
<b>By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.</b>		

12/20/22

Dear Experian,

Enclosed is my FTC report. Please update my identity theft file with you.

Thank you,

Frederick H. Miller

Frederick H. Miller

**REDACTED**

NFCU000165



FEDERAL TRADE COMMISSION

## Identity Theft Report



I am a victim of identity theft. This is my official statement about the crime.

## Contact Information

First Name:	Last Name:	
Frederick	Miller	
Address:	Phone:	Email:
USA	914-882-4419	fhmiller@icloud.com

## Accounts Affected by the Crime

Credit Card Opened by the Thief	
Company or Organization: Navy FCU	
Date that I discovered it:	Total fraudulent amount:
11/2022	\$ 4300

## Fraudulent Checking or Savings Account

Company or Organization: Navy FCU	
Date that I discovered it:	Total fraudulent amount:
11/2022	\$ 0

Under penalty of perjury, I declare this information is true and correct to the best of my knowledge.

I understand that knowingly making any false statements to the government may violate federal, state, or local criminal statutes, and may result in a fine, imprisonment, or both.

Frederick Miller

*Frederick*

12/20/2022

Date

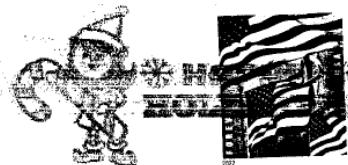
Use this form to prove to businesses and credit bureaus that you have submitted an FTC Identity Theft Report to law enforcement. Some businesses might request that you also file a report with your local police.

NFCU000166

**Frederick H. Miller**  
7120 Okeechobee Blvd., #5206  
West Palm Beach, FL 33411

WEST PALM BCH FL 334

20 DEC 2022 PM 4 L



*Experion  
PO Box 9554  
Allen, TX 75013*

75013-955454

NFCU000167

# **EXHIBIT "D"**

ACDV Response:				376372395033001
Account Number:	REDACTED 7885	SSN:	REDACTED	
Consumer Name:	FREDERICK H MILLER	Control Number:	376372395033001	
Date Received:	1/10/2023	Originator:	TransUnion	
Response Code:	23:Disputed information accurate. Updated account information unrelated to the dispute.	Subscriber Code:	692N001	
Response Date:	01/23/2023	DF Contact Number:		
Response Due Date:	02/05/2023	DF Authorized Name:	Alexandra Chuah	
Queue Name:	ID Theft Fraud			
Dispute Information:				
Dispute Code 1:	103:Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.			
Dispute Code 2:				
FCRA Relevant Information:	cons claims This account is fraudulent			
Image Information:				
Associated Images:	No			
Image ID:				
Image Accessed Indicators:				
Consumer Information:				
	Request Data	Response Data	Same / Diff	
Last Name:	MILLER	MILLER	Same	
First Name:	FREDERICK	FREDERICK	Same	
Middle Name:	H		Unknown	
Generation Code:			Unknown	
Prev. Last Name:	MILLER		Unknown	
Prev. First Name:	FREDERICK		Unknown	
Prev. Middle Name:	HOWARD		Unknown	
Prev.Generation Code:				
SSN:	REDACTED	REDACTED	Same	
Date Of Birth:	REDACTED	REDACTED	Same	
Telephone Number:	9148824419		Unknown	
ECOA Code:	1:Individual	1:Individual		
Street Address:	7120 OKEECHOBEE BLVD APT 5206	601 DEER RD	Different	
City:	WEST PALM BEACH	CHERRY HILL		
State:	FL:Florida	NJ:New Jersey		
Zip:	334112467	80341409		
Prev. Street Address:	7120 OKEECHOBEE BLVD		Unknown	
Prev. City:	WEST PALM BEACH			
Prev. State:	FL:Florida			
Prev. Zip:	334112414			
2nd Prev. Street Address:	5147 ELLERY TER			
2nd Prev. City:	WEST PALM BEACH			
2nd Prev. State:	FL:Florida			
2nd Prev. Zip:	334178357			

3.76372E+14																
Account Information:																
Account Status:	Request Data										Response Data					
Account Status:	78:Account 60-89 days past the due date.										80:Account 90-119 days past the due date.					
Payment Rating:																
Cond. / Cum. Status:																
CII:																
MOP:																
CCC:	XC:Completed investigation of FCRA dispute - consumer disagrees.															
SCC:	M:Account closed at credit grantor's request.															
Portfolio Type:	R:Revolving (open-end account)															
Account Type:	18:Credit Card															
Interest Type Indicator:																
Terms Duration:	REV															
Terms Frequency:	M:Monthly															
Date Opened:	07/30/2022															
Date of Account Information:	12/30/2022										01/23/2023					
Date of Last Payment:																
Date Closed:	12/01/2022										12/14/2022					
FCRA DOFD:	11/01/2022															
Current Balance:	4546															
Amount Past Due:	177															
High Credit / Original Amt.:	4546															
Credit Limit:	8900															
Original Charge Off Amount:																
Actual Payment:	0															
Scheduled Monthly Payment:	90										92					
Original Creditor Name:																
Creditor Classification:																
Agency ID:																
Sec. Mktg. Agency Acct Num:																
Mortgage ID Number (MIN):																
Specialized Payment Ind.:																
Defrd. Payment Start Date:																
Balloon Payment Amt.:																
Balloon Payment Due Date:																
Portfolio Indicator:																
Purchased From / Sold To:																
Narrative / Remarks:																
Account History																
Year	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan				
2023	Req.															
	Resp.															
2022	Req.	D	1	0	E	B	-	-	-	-	-	-				
	Resp.	2	1	0	E	B	-	-	-	-	-	-				
2021	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2020	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2019	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2018	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2017	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Req.	-	-	-	-	-	-	-	-	-	-	-				
2016	Req	-	-	-	-	-	-	-	-	-	-	-				
	Res	-	-	-	-	-	-	-	-	-	-	-				

		3.76372E+14
<b>Associated Consumer Information</b>		
Last Name:		
First Name:		
Middle Name:		
Generation Code:		
SSN:		
Date Of Birth:		
Telephone Number:		
ECOA Code:		
CII:		
Street Address:		
City:		
State:		
Zip:		
Submitted by:	Alexandra Chuah	Date: 01/23/2023
<b>By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.</b>		

# **EXHIBIT "E"**

<b>ACDV Response:</b>				99993026508492016
<b>Account Number:</b>	<b>REDACTED</b> 7885	<b>SSN:</b>	<b>REDACTED</b>	
<b>Consumer Name:</b>	FREDERICK H MILLER	<b>Control Number:</b>		99993026508492016
<b>Date Received:</b>	1/26/2023	<b>Originator:</b>		Equifax
<b>Response Code:</b>	7:	<b>Subscriber Code:</b>		491ON24219
<b>Response Date:</b>	01/31/2023	<b>DF Contact Number:</b>		
<b>Response Due Date:</b>	02/17/2023	<b>DF Authorized Name:</b>		Kizzie Roulhac
<b>Queue Name:</b>	ID Theft Fraud			
<b>Dispute Information:</b>				
<b>Dispute Code 1:</b>	103:Claims true identity fraud, account fraudulently opened. Provide or confirm complete ID.			
<b>Dispute Code 2:</b>				
<b>FCRA Relevant Information:</b>	RECEIVED FROM TUN on 01/26/2023			
<b>Image Information:</b>				
<b>Associated Images:</b>	No			
<b>Image ID:</b>				
<b>Image Accessed Indicators:</b>				
<b>Consumer Information:</b>				
	<b>Request Data</b>	<b>Response Data</b>		<b>Same / Diff</b>
<b>Last Name:</b>	MILLER			
<b>First Name:</b>	FREDERICK			
<b>Middle Name:</b>	H			
<b>Generation Code:</b>				
<b>Prev. Last Name:</b>				
<b>Prev. First Name:</b>				
<b>Prev. Middle Name:</b>				
<b>Prev.Generation Code:</b>				
<b>SSN:</b>	<b>REDACTED</b>			
<b>Date Of Birth:</b>	<b>REDACTED</b>			
<b>Telephone Number:</b>	5612251083			
<b>ECOA Code:</b>	1:Individual			
<b>Street Address:</b>	7120 OKEECHOBEE BLVD APT 5206			
<b>City:</b>	WEST PALM BEACH			
<b>State:</b>	FL:Florida			
<b>Zip:</b>	33411			
<b>Prev. Street Address:</b>	6801 LOUISVILLE ST			
<b>Prev. City:</b>	NEW ORLEANS			
<b>Prev. State:</b>	LA:Louisiana			
<b>Prev. Zip:</b>	70124			
<b>2nd Prev. Street Address:</b>	601 DEER RD			
<b>2nd Prev. City:</b>	CHERRY HILL			
<b>2nd Prev. State:</b>	NJ:New Jersey			
<b>2nd Prev. Zip:</b>	8034			

9.9993E+16																
Account Information:																
Account Status:	Request Data										Response Data					
Payment Rating:	80:Account 90-119 days past the due date.															
Cond. / Cum. Status:																
CII:																
MOP:																
CCC:																
SCC:																
Portfolio Type:	R:Revolving (open-end account)															
Account Type:	18:Credit Card															
Interest Type Indicator:																
Terms Duration:	REV															
Terms Frequency:	M:Monthly															
Date Opened:	07/30/2022															
Date of Account Information:	01/09/2023															
Date of Last Payment:																
Date Closed:	12/01/2022															
FCRA DOFD:	11/01/2022															
Current Balance:	4566															
Amount Past Due:	267															
High Credit / Original Amt.:	4566															
Credit Limit:	8900															
Original Charge Off Amount:																
Actual Payment:																
Scheduled Monthly Payment:	92															
Original Creditor Name:																
Creditor Classification:																
Agency ID:																
Sec. Mktg. Agency Acct Num:																
Mortgage ID Number (MIN):																
Specialized Payment Ind.:																
Defrd. Payment Start Date:																
Balloon Payment Amt.:																
Balloon Payment Due Date:																
Portfolio Indicator:																
Purchased From / Sold To:																
Narrative / Remarks:	CLOSED ACCOUNT															
Account History																
Year	Dec	Nov	Oct	Sep	Aug	Jul	Jun	May	Apr	Mar	Feb	Jan				
2023	Req.															
	Resp.															
2022	Req.	2	1	0	E	B	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2021	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2020	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2019	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2018	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Resp.	-	-	-	-	-	-	-	-	-	-	-				
2017	Req.	-	-	-	-	-	-	-	-	-	-	-				
	Req.	-	-	-	-	-	-	-	-	-	-	-				
2016	Req	-	-	-	-	-	-	-	-	-	-	-				
	Res	-	-	-	-	-	-	-	-	-	-	-				

		9.9993E+16
<b>Associated Consumer Information</b>		
Last Name:		
First Name:		
Middle Name:		
Generation Code:		
SSN:		
Date Of Birth:		
Telephone Number:		
ECOA Code:		
CII:		
Street Address:		
City:		
State:		
Zip:		
Submitted by:	Kizzie Roulhac	Date: 01/31/2023
<b>By submitting this ACDV, you certify that you have reviewed and considered all associated Images, you have verified the accuracy of the data in compliance with all legal requirements, and your computer and/or manual records will be adjusted to reflect any changes noted.</b>		